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February 16, 2007

The Honorable Gregory M. Sleet
United States District Court
for the District of Delaware
844 King Street
Wilmington, DE 19801

BY E-FILING

Re: *Automotive Technologies International, Inc. v. American Honda Motor Co., Inc., et al.*, C.A. No. 06-187-GMS

Dear Judge Sleet:

In anticipation of the discovery conference scheduled for Wednesday, February 21, 2007 at 11:00 a.m., the parties submit the following joint agenda. Defendants do not agree, however, that plaintiff's issues are ripe for decision.

Defendants' Issues:

1. A stay of this suit pending reexamination by the Patent Office.
2. Disputes regarding a stipulated Protective Order;
3. The inadequacy of ATI's privilege log;
4. ATI's failure to produce prior art and related documents;
5. Documents concerning the '022 patent;
6. Agreements and/or licenses pertaining to the field of technology at issue;
7. Documents relating to any financial interest ever held by anyone involved in the prosecution of the ATI patents ;
8. A date certain by which ATI will comply with its agreement to supplement document production to Requests Nos. 13, 45, 99, and 101 and responses concerning Interrogatory Nos. 4 and 5;

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9. ATI's contentions concerning secondary considerations of non-obviousness;

10. ATI's inadequate infringement contentions.

Plaintiff's Issues As To Defendants:

1. Defendants' failure to provide the identity of fact or expert witnesses.

2. Failure to produce documents or information concerning all of the subcomponents of the accused systems.

3. Failure to produce financial information re the costs and prices of all systems at issue.

4. Failure to produce documents re inequitable conduct.

5. Failure to produce 50,000 pages of documents.

6. Failure to produce samples of various models of accused devices.

7. Failure to produce all documents relating to Phil Rittmeueller.

8. Failure to identify knowledgeable personnel at GM and Honda.

9. Failure to provide information concerning the replacement sales.

10. Failure to produce information about safety-related licenses taken or issued by GM and Honda.

11. Defendants' failure to supplement interrogatory answers.

Respectfully,



Thomas C. Grimm (#1098)

cc: Dr. Peter T. Dalleo, Clerk (by hand)
Richard K. Herrmann, Esquire (by e-filing & e-mail)
Timothy Q. Delaney, Esquire (by e-mail)
Andrew Kochanowski, Esquire (by e-mail)
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